

NEW YORK
LONDON
SINGAPORE
PHILADELPHIA
CHICAGO
WASHINGTON, DC
SAN FRANCISCO
SILICON VALLEY
SAN DIEGO
LOS ANGELES
TAIWAN
BOSTON
HOUSTON
AUSTIN
HANOI
HO CHI MINH CITY

DuaneMorris®

FIRM and AFFILIATE OFFICES

ERIC R. BRESLIN
DIRECT DIAL: +1 973 424 2063
PERSONAL FAX: +1 973 556 1552
E-MAIL: ERBreslin@duanemorris.com

www.duanemorris.com

SHANGHAI
ATLANTA
BALTIMORE
WILMINGTON
MIAMI
BOCA RATON
PITTSBURGH
NEWARK
LAS VEGAS
CHERRY HILL
LAKE TAHOE
MYANMAR
OMAN
*A GCC REPRESENTATIVE OFFICE
OF DUANE MORRIS*
ALLIANCES IN MEXICO
AND SRI LANKA

August 31, 2022

VIA ECF

Honorable Richard M. Berman
United States District Court
Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: United States v. Daniel Carino, No. 21-cr-00598 (RMB)

Dear Judge Berman:

We are the attorneys for Daniel Carino. The current deadline to file pretrial motions, motions in limine, draft jury charges and proposed voir dire is September 1, 2022. However, the parties are engaged in ongoing discussions concerning a potential pretrial resolution, and respectfully seek additional time to continue those discussions before the upcoming deadline. We request that the filing deadline be extended two weeks to September 15, 2022. The government consents to this request.

For the Court's convenience, we have included a "So Ordered" line should the Court grant our request. Thank you for your consideration.

Respectfully submitted,

/s/ Eric R. Breslin

Eric R. Breslin

cc: All Counsel of Record (Via ECF)

SO ORDERED



Honorable Richard M. Berman, U.S.D.J.

DUANE MORRIS LLP A DELAWARE LIMITED LIABILITY PARTNERSHIP

GREGORY R. HAWORTH, RESIDENT PARTNER

ONE RIVERFRONT PLAZA, 1037 RAYMOND BLVD., SUITE 1800
NEWARK, NJ 07102-5429

PHONE: +1 973 424 2000 FAX: +1 973 424 2001